UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DAILY NEWS, LP; CHICAGO TRIBUNE COMPANY, LLC; ORLANDO SENTINEL COMMUNICATIONS COMPANY, LLC; SUN-SENTINEL COMPANY, LLC; SAN JOSE MERCURY-NEWS, LLC; DP MEDIA NETWORK, LLC; ORB PUBLISHING, LLC; AND NORTHWEST PUBLICATIONS, LLC, Plaintiffs, v. MICROSOFT CORPORATION, OPENAI, INC., OPENAI LP, OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC, Defendants.	Civil Action No. 1:24-cv-03285-SHS Hon. Sidney H. Stein **DECLARATION OF THOMAS E. GORMAN IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE***

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I, Thomas E. Gorman, pursuant to 28 U.S.C § 1746, declare under penalty of perjury as follows:

1.   I am a member of the law firm of Keker, Van Nest & Peters LLP.

2.   I submit this declaration in support of my Motion to Admit Counsel *Pro Hac Vice* in the above-captioned matter.

3.   I have been a member in good standing of the Bar of the State of California since December 3, 2011

4.   I attach a Certificate of Good Standing from the State of California, which was issued within thirty days of this filing, as Exhibit A to my Motion to Admit Counsel *Pro Hac Vice.*

5.   I have never been convicted of a felony or been the subject of any criminal conviction.

6.   I have never been censured, suspended, disbarred or denied admission or readmission by any court.

7.   I have never been the subject of a disciplinary sanction and there are no disciplinary proceedings presently pending against me.

Wherefore your declarant respectfully submits that he be permitted to appear as counsel *Pro Hac Vice* in this one case on behalf of Defendants OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo, LLC, OpenAI Global, LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 4, 2024

/s/ Thomas E. Gorman
THOMAS E. GORMAN

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